



## Requirements for Export to the People's Republic of China

### Fish Meal Inspection Program

Effective July 1, 2012 all fish meal, fish oil, and other aquatic animal proteins (used as feed and feed additives) to be exported from the United States to the People's Republic of China (PRC) must meet the requirements of Administration of Quality Supervision Inspection and Quarantine (AQSIQ) No. 118 Decree (copy attached). According to this decree all manufacturing facilities that produce feed and feed additives must be registered with AQSIQ. In order to be registered, a facility must participate in the NOAA Seafood Inspection Program (SIP) and be approved by SIP to export to the PRC. Approval will only be given if all hygiene and quarantine requirements of the PRC for imports of fish oil, fish meal and other aquatic animal proteins are met. Upon approval, the SIP will add the facility to the list of approved facilities provided to AQSIQ.

#### SIP Requirements:

Facilities wishing to export fish meal, fish oil, and other aquatic animal proteins to the PRC must be under contract with SIP for at least 3 audits per year (for facilities storing product in bulk and exporting product outside of the fishing/production season the following is recommended: 1 audit prior to start of fishing season; 1 audit during the fishing season; and 1 audit after the close of the fishing season). SIP regional offices and auditors will assure that all facilities are in compliance with AQSIQ requirements as well as the SIP Hazard Analysis Critical Control Point (HACCP) Program and Quality Management Program (QMP). The facilities management controls and responsibilities; feed safety programs; sanitation and prerequisite programs; and quality systems will be audited according to the Policies, Procedures, and Requirements for the Approval of Facilities and Systems (available on the SIP website). During each audit, a minimum of 5 verification samples collected randomly from multiple lots of finished product will be collected aseptically by SIP auditors and sent to the National Seafood Inspection Laboratory for *Salmonella*, Enterobacteriaceae, and Total Plate Count analyses. Laboratory results from third party and in house laboratories will also be reviewed to determine compliance with the hygiene standards set by AQSIQ.

#### Laboratory Testing Requirements:

Product for export to the PRC must be in compliance with the PRC Hygiene standards listed below and be tested at the frequency indicated. These tests may be performed by a third party laboratory that has been recognized by the National Seafood Inspection Laboratory as a laboratory accredited against ISO standards for the specific analyses being performed.

<u>Hygiene Standards</u>		
<u>Testing Requirements for Meal:</u>		
Mercury	≤ 0.5 mg/kg	Annual
Cadmium (Cd)	≤ 2.0 mg/kg	Annual
Lead	≤ 10 mg/kg	Annual
Chromium (Cr)	≤ 8 mg/kg	Annual
Arsenic (As)	≤ 10 mg/kg	Annual
Total count of mold	≤ 20000 cfu/g	Annual
Salmonella	Not detected	Each Lot/Consignment
Shigella	Not detected	Annual
Enterobacteriaceae	≤ 300 MPN/g	Each Lot/Consignment
Total plate count	≤ 2000000 cfu/g	Each Audit
Melamine	≤ 2.0 mg/kg	Annual
Malachite green	Not detected	*
Dioxin	≤ 1.25 ng/kg	Annual
<u>Testing Requirements for Oil:</u>		
Salmonella	Not detected	**
Coli group	≤ 300 MPN/g	**



Malachite green	Not detected	*
Dioxin	≤ 6.0 ng/kg	Each Audit

\*Not required for wild caught fish. For aquacultured fish, annual testing is required.

\*\*The water activity of fish oil is too low to support the growth of bacteria, therefore microbiological testing of oil that has been properly heat treated is not required as long as processing CCPs are met.

Testing for ruminant protein: For facilities that handle only fisheries products, PCR testing (by a laboratory approved by APHIS) for ruminant protein will be required annually. For facilities that handle other animal proteins as well as fisheries products, PCR analysis for ruminant proteins will be required for each shipment of fish meal to the PRC.

Verification Testing and Monitoring: In addition to third party laboratory testing, verification sampling/testing and monitoring will be conducted in Federal Laboratories. The National Seafood Inspection Laboratory (USDC) will analyze verification samples collected by SIP auditors for microbiological analysis including *Salmonella*, Enterobacteriaceae, Mold, and Total Plate Count. Test results from the Food and Drug Administration's Feed Contaminants Program, Feed Manufacturing compliance Program, Illegal Drug Residue Program, and BSE/Ruminant Feed Ban Inspections will also be used as additional verification of the safety and wholesomeness of the feed supply. [www.fda.gov/AnimalVeterinary/GuidanceComplianceEnforcement/ComplianceEnforcement/ucm112583.htm](http://www.fda.gov/AnimalVeterinary/GuidanceComplianceEnforcement/ComplianceEnforcement/ucm112583.htm)

A list of FDA Regional Laboratories may be found at <http://www.fda.gov/ICECI/Inspections/IOM/ucm124067.htm>. Verification testing for aquatic animal diseases and BSE will be done by USDA/APHIS approved laboratories [http://www.aphis.usda.gov/animal\\_health/lab\\_info\\_services/approved\\_labs.shtml](http://www.aphis.usda.gov/animal_health/lab_info_services/approved_labs.shtml) and [http://www.aphis.usda.gov/animal\\_health/nahln/labs.shtml](http://www.aphis.usda.gov/animal_health/nahln/labs.shtml).

#### Specific Requirements of the PRC:

A list of facilities approved by SIP will be provided to AQSIQ. Facilities will be included on the list only if the following requirements are met:

- The establishment must implement HACCP and have a system to ensure the recall and traceability of products;
- Products must meet the requirements of the United States and be allowed for free sale;
- Raw materials used to produce fish oil, fish meal or other aquatic animal proteins may be aquatic animals caught in domestic waters or in the open sea; aquacultured animals; or by-products from plants manufacturing aquatic products for human consumption. Aquatic animals killed for disease eradication cannot be used as raw materials.
- The product must not contain any ingredients of non-aquatic animals and must not be contaminated by any products of animal origin from third countries.
- Products must be subjected to a heat treatment of at least 85C for 15 minutes or other time/temperature combinations that have been validated to be equivalent;
- Effective measures must be taken to prevent contamination both during and post processing;
- Fish oil, fish meal and other aquatic animal proteins must not contain hazardous substances which pose a risk to public or animal health and must be in compliance with the safety and hygiene standards listed below;
- All fish oil, fish meal or other aquatic animal proteins intended for export to the PRC must be tested and found to be negative for ruminant proteins by PCR or other effective methods;
- Products for export must meet the following microbiological requirements:
  - *Salmonella*: Absent in 25 g: n=5, c=0, m=0, M=0
  - Enterobacteriaceae: n=5, c=2, m=10, M=300 in 1 g
- The end product must be packaged in new, clean, sealed, impermeable, moisture resistant and not easily broken materials and labeled in compliance with standards set by the PRC; or for bulk shipments, the containers or other means of transport should be thoroughly cleaned and disinfected with a disinfectant approved by the competent authority before use;
- Each shipment must be accompanied with an original health certificate.



#### Request for Export Certification:

Export certificates for product to be exported to the PRC will only be issued by SIP if the facility is approved for export based upon compliance with PRC requirements as indicated by audit reports and laboratory testing results. The request for inspection and results from third party laboratories must be submitted via email to [NMFS.SI.Fishmeal@noaa.gov](mailto:NMFS.SI.Fishmeal@noaa.gov) prior to any export documentation being issued. All laboratory results and audit reports will be reviewed by the SIP Regional Office responsible for issuing export certification to verify compliance with all PRC and SIP requirements.

#### Procedures for industry requesting Fishmeal Exports

- Obtain the appropriate laboratory analysis for shipment. Verification that each shipment meets the import country regulations will be done by SIP prior to issuance of the export documentation.
- Obtain and complete the Request for Certification / Fishmeal Exports (available online or from the local SIP inspection office).
- Forward the completed form to: [NMFS.SI.Fishmeal@noaa.gov](mailto:NMFS.SI.Fishmeal@noaa.gov) within the same email forward all 3rd party laboratory reports or NOAA/NSIL reports that support the shipment requirements to the destination country. All reports must identify "Lots sampled to the Lots being shipped."
- When submitting the request, make sure to use the following instruction to label the subject line in the email message: Company Name AND Facility FEI Number, country of destination, then use A-Z to mark multiple shipments on a single day. Example: Roberts Fish House, #3014244321, China, A Please make sure to use the correct FEI or CFN # listed officially on the Country of Destination Approved Fishmeal Exporter List
- Allow up to 72 business hours for completion of documentation.
- All certificates will be delivered overnight via UPS unless otherwise noted.

Link to [Request Form](#)